

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALEXANDER STYLLER, INTEGRATED
COMMUNICATIONS & TECHNOLOGIES,
INC., JADE CHENG, JASON YUYI, CATHY
YU, CAROLINE MARAFAO CHENG,
PUSHUN CHENG, CHANGZHEN NI,
JUNFANG YU, MEIXIANG CHENG,
FANGSHOU YU, and CHANGHUA NI,

Plaintiffs,

vs.

HEWLETT-PACKARD FINANCIAL
SERVICES COMPANY, HEWLETT-
PACKARD FINANCIAL SERVICES (INDIA)
PRIVATE LIMITED, HP INC., HEWLETT
PACKARD ENTERPRISE COMPANY, and
DAVID GILL,

Defendants.

Civil Action No. 1:16-CV-10386 (LTS)

**JOINT MOTION AND STIPULATION FOR EXTENSION OF TIME
TO OPPOSE MOTION TO COMPEL RE: APRIL 22, 2013 LETTER**

The Parties respectfully move the Court for a two-week extension of the deadline by which Defendants must file an opposition to Plaintiffs' *Motion to Compel Production of the Native File and Metadata of the April 22, 2013 Final Letter* (ECF 419) (the "Motion"). In support of this request, the Parties jointly state as follows:

1. On November 24, 2020, Plaintiffs (through prior counsel) filed the Motion.
2. Defendants' deadline to oppose the Motion is December 8, 2020.
3. The Parties have conferred and believe that an additional meet-and-confer will limit the issues or moot the Motion entirely.

4. In light of the foregoing, the Parties respectfully request a two-week extension (until December 22, 2020) of Defendants' deadline to (if necessary) oppose the Motion.

5. This request is made in good faith and not for any unreasonable delay.

Dated: December 8, 2020

Respectfully submitted,

/s/ G. Mark Edgarton

Michael H. Bunis (BBO No. 566839)
G. Mark Edgarton (BBO No. 657593)
Kevin C. Quigley (BBO No. 685015)
CHOATE HALL & STEWART LLP
Two International Place
Boston, Massachusetts 02110
(617) 248-5000
mbunis@choate.com
medgarton@choate.com
kquigley@choate.com

Anthony P. Callaghan
Paul A. Saso
GIBBONS P.C.
One Pennsylvania Plaza, 37th Floor
New York, New York, 10119
(212) 613-2000

Counsel for Defendants

/s/ Luke Nikas

Luke Nikas
Alex Spiro
Alex S. Zuckerman
**QUINN EMANUEL URQUHART &
SULLIVAN LLP**
51 Madison Avenue, 22nd Floor
New York, NY 10010
(212) 849-7000

Counsel for Plaintiffs

Local Rule 7.1(a)(2) Certification

I, G. Mark Edgerton, Attorney for Defendants Hewlett-Packard Financial Services Company, Hewlett-Packard Financial Services (India) Private Limited, HP Inc., Hewlett Packard Enterprise Company, and David Gill, hereby certify that on December 8, 2020 the parties conferred and reached the above-described agreement.

/s/ G. Mark Edgerton

G. Mark Edgerton